

George Hofmann (10005)
Matthew M. Boley (8536)
Adam H. Reiser (13339)
Cohne Kinghorn, P.C.
111 East Broadway, 11th Floor
Salt Lake City, UT 84111
Telephone: (801) 363-4300
Facsimile: (801) 363-4378

Attorneys for debtor-in-possession
Quinn's Junction Properties, LC.

**IN THE UNITED STATES BANKRUPTCY COURT
DISTRICT OF UTAH, CENTRAL DIVISION**

In re

QUINN'S JUNCTION PROPERTIES, LC.,

Debtor.

Bankruptcy No. 16-24458 (JTM)

Chapter 11

**NOTICE OF DEBTOR'S MOTION FOR AN ORDER (i) APPROVING DISCLOSURE
STATEMENT WITH RESPECT TO DEBTOR'S PLAN OF REORGANIZATION, (ii)
ESTABLISHING VOTING RECORD HOLDER DATE, (iii) APPROVING
SOLICITATION PROCEDURES, FORM OF BALLOTS, AND MANNER OF NOTICE,
AND (iv) FIXING THE DEADLINE FOR FILING OBJECTIONS TO THE
CONFIRMATION OF THE PLAN AND TIME FOR CONFIRMATION HEARING AND
OBJECTIONS TO CONFIRMATION**

(Objection Deadline: October 24, 2016)

(Hearing Date: November 3, 2016 at 10:00 a.m.)

PLEASE TAKE NOTICE that Quinn's Junction Properties, LC. (the "Debtor"), has filed with the United States Bankruptcy Court for the District of Utah its Motion for an Order (i) Approving Disclosure Statement With Respect to Debtor's Plan of Reorganization, (ii) Establishing Voting Record Holder Date, (iii) Approving Solicitation Procedures, Form of Ballots, and Manner of Notice, and (iv) Fixing the Deadline for Filing Objections to the Confirmation of the Plan and Time for Confirmation Hearing and Objections to Confirmation (the "Motion").

YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

A copy of the Motion is being served on you together with this Notice. If you wish to obtain a copy of the Debtor's proposed Disclosure Statement and related Plan of Reorganization, you may obtain copies of these documents online through the Court's CM/ECF electronic filing system, or by written request to the undersigned counsel to the Debtor.

If you do not want the Court to grant the relief requested in the Motion, then you or your lawyer must **both**:

(1) on or before October 24, 2016, file with the Bankruptcy Court a written objection to the Motion, explaining your position, at:

United States Bankruptcy Court
350 South Main Street, Room 301
Salt Lake City, UT 84101

If you mail your objection to the Bankruptcy Court for filing you must mail it early enough so that the Court will **receive** it on or before October 24, 2016. You also must mail a copy to the undersigned counsel at:

George Hofmann
COHNE KINGHORN, P.C.
111 East Broadway, 11th Floor
Salt Lake City, UT 84101

and

(2) attend the hearing on the Motion which is set for November 3, 2016 at 10:00 a.m. in Courtroom 341, United States Bankruptcy Court, 350 South Main Street, Salt Lake City, Utah 84101. **Failure to attend the hearing will be deemed a waiver of your objection.**

If you or your attorney do not take both of the above-described steps, the Bankruptcy Court may decide that you do not oppose the relief sought in the Motion, and may enter an order granting that relief.

In the absence of a timely filed objection, the undersigned counsel may and will ask the Court to strike the hearing enter an order approving the Motion without hearing.

Dated: September 22, 2016 **COHNE KINGHORN, P.C.**

/s/ George Hofmann
GEORGE HOFMANN
Attorneys for the Debtor